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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

OSLAIDA CRUZ DE OSES,

Plaintiff,

v.

KILOLO KIJAKAZI,
Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01201-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 23, filed on December 14, 2022), currently due on January 13, 2023, by 31 days, through and including February 13, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 22) be extended accordingly. Plaintiff's optional reply shall therefore be due on March 6, 2023.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant respectfully requests this additional time because counsel is currently in the process of determining if a settlement agreement is possible. If the case cannot be settled, then

1 Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Motion to Reversal
2 and/or Remand. This request is made in good faith and with no intention to unduly delay the
3 proceedings.

4 On January 12, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no
5 opposition to this motion.

6 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
7 Motion for Reversal and/or Remand, through and including February 13, 2023.

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9 Dated: January 12, 2023

Respectfully submitted,

10 JASON M. FRIERSON
11 United States Attorney

12 /s/ David Priddy
13 DAVID PRIDDY
14 Special Assistant United States Attorney

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16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 1-13-2023
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

Dated: January 12, 2023

/s/ David Priddy
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